

FILED

MAR 29 2023

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No. **23 CR 117 GKF**

Plaintiff,

INFORMATION

v.

**[18 U.S.C. § 1349 – Bank Fraud
Conspiracy]**

DAWNA ROCHELLE SANDERS,

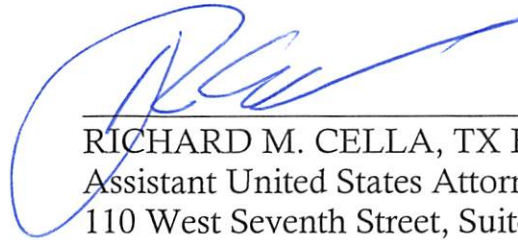
Defendant.

THE UNITED STATES ATTORNEY CHARGES:

From in or about 2009 to approximately April of 2016, in the Northern District of Oklahoma, the defendant, **DAWNA ROCHELLE SANDERS**, knowingly and willfully conspired, confederated, and agreed with T.G.H., a person known to the United States Attorney, and others known to the United States Attorney (the “Conspirators”), to commit and attempt to commit Bank Fraud, in violation of Title 18, United States Code, Section 1344, by executing and attempting to execute a scheme and artifice to defraud Bank of Oklahoma, a financial institution within the meaning of Title 18, United States Code, Section 20, the accounts of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, assets, and other property owned by and under the custody and control of Bank of Oklahoma, by means of materially false and fraudulent pretenses, representations, and promises, by fraudulently causing unauthorized payments to be made from the Bank of Oklahoma bank account of **SANDERS’s** employer, P.C.S., to the Conspirators, resulting in a loss to P.C.S. of no less than \$1,194,418.64.

All in violation of Title 18, United States Code, Section 1349.

CLINTON J. JOHNSON
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